

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

PETER GHAVAMI  
(aka PETER GHAVAMILAHIDJI),  
GARY HEINZ, and  
MICHAEL WELTY,

Defendants.

1:10-CR-01217 (KMW)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Wilmer Cutler Pickering Hale and Dorr LLP's Motion to Quash Subpoena, dated July 3, 2012, and the accompanying Declaration of David Olsky, Non-Party Wilmer Cutler Pickering Hale and Dorr LLP by the undersigned attorneys will move this Court before the Honorable Kimba M. Wood, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, on a date to be determined, for an Order pursuant to Federal Rule of Criminal Procedure 17(c)(2).

Dated: New York, New York  
July 3, 2012

Respectfully submitted,

WILMER CUTLER PICKERING HALE  
AND DORR LLP

/s/ Peter Neiman

Peter Neiman  
Thomas Mueller  
David Olsky

399 Park Avenue  
New York, NY 10022  
(212) 230-8800

(212) 230-8888 (fax)  
peter.neiman@wilmerhale.com  
thomas.mueller@wilmerhale.com  
david.olsky@wilmerhale.com

*Counsel for Non-Party Wilmer Cutler  
Pickering Hale and Dorr LLP*